

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

BRICKSTOP CORPORATION,)	
)	
Plaintiff,)	Case No. 08-CV-2690
)	
v.)	Honorable Judge Gettleman
)	
VALLEY VIEW INDUSTRIES, H.C., INC.,)	Magistrate Judge Cole
)	
Defendant.)	

DEFENDANTS' MOTION TO FILE DOCUMENTS UNDER SEAL

Defendant, Valley View Industries, H.C., Inc. ("Valley View"), by its attorneys, and under Local Rule 5.8 and Paragraph 12 of the Stipulated Protective Order signed by the parties in this matter, and the Court's standing order, hereby moves for an order allowing it to file certain documents under seal:

1. On June 6, 2008, Plaintiff BrickStop Corporation ("BrickStop") filed a motion for a preliminary injunction and supporting materials. (Docket Nos. 12-14, 21.)
2. Under the schedule set by the Court, Valley view's opposition to this motion is due on August 8, 2008. (*See* Docket No. 16.)
3. Valley View and BrickStop have conducted discovery in this matter. To facilitate discovery, the parties signed a Stipulated Protective Order which is being submitted for the Court's approval contemporaneously with this motion.
4. Under the terms of that Stipulated Protective Order, the parties have designated as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" certain materials and deposition testimony which Valley View must discuss and attach to its response brief in order to fully defend itself in this action.

5. On August 8, 2008, Valley view will file with the Court's electronic filing system a copy of its response brief, with supporting materials, with the confidential material redacted or omitted. At the same time, Valley View will physically serve Brickstop's counsel and the Court with un-redacted versions of the brief and supporting materials.

6. Without an order of this Court, however, Valley view cannot file under seal the un-redacted materials with the Clerk of the Court.

WHEREFORE, Valley View respectfully requests that this Court enter an order providing that:

A. Valley View may file an un-redacted copy of its response brief, with supporting materials, under seal; and

B. Granting any further relief that the Court deems proper and equitable.

Dated: July 30, 2008

Respectfully, submitted,

VALLEY VIEW INDUSTRIES, H.C., INC.

By: /s/ Monica L. Thompson
One of its Attorneys

Attorneys for Defendant
Monica L. Thompson
R. Blake Johnston
DLA Piper US LLP
203 North LaSalle Street, Suite 1900
Chicago, IL 60601
Tel: 312 368-4000

CERTIFICATE OF SERVICE

I hereby certify that on July 30, 2008, a copy of the foregoing was filed electronically.
Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.
Parties may access this filing through the Court's system.

By: /s/ Monica L. Thompson
One of its Attorneys

Attorneys for Defendant
Monica L. Thompson
R. Blake Johnston
DLA Piper US LLP
203 North LaSalle Street, Suite 1900
Chicago, IL 60601
Tel: 312 368-4000